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13 **UNITED STATES DISTRICT COURT**
14 **FOR THE DISTRICT OF NEVADA**

16 **SAID ELMAJZOUN,**

17 Plaintiff,

18 -vs-

19 **SCOTT DAVIS, et al.,**

20 Defendant(s).

Case No. 3:19-cv-00196-MMD-WGC

**STIPULATION AND ORDER TO
CONTINUE ALL DEADLINES AND
ARGUMENT**

**[SECOND REQUEST FOR
EXTENSION OF DEADLINES AND
ARGUMENT]**

1 Defendants, Renee Baker, Tara Carpenter, Scott Davis, Marc La Fleur, And Kim
2 Thomas (collectively, “Defendants”), by and through their Associate Counsel, Frank
3 Toddre II, Esq. and Mandy Vogel of the law firm McCormick, Barstow, Sheppard, Wayte,
4 and Carruth, LLP, and Plaintiff, Said Elmajzoub, by and through his counsel, CAIR Legal
5 Defense Fund, Gadeir I. Abbas, Lena F. Masri, Justin Sadowsky, and Allen Lichtenstein,
6 respectfully submit the following Stipulation and Order to Continue All Deadlines and
7 Argument.

8 After the Settlement Conference on December 19, 2022, the parties continued to
9 informally discuss potential settlement of the case. The parties had previously set forth a
10 Stipulation to Extend the Joint Pretrial Order, which has since been granted. Based on that
11 progress, the parties filed a motion to stay the remaining deadlines on February 1, 2023,
12 which has also been granted.

13 The parties have since come to an agreement in principle that would resolve the case,
14 including both the trial and both pending motions (the partial motion for fees and the
15 motion to enforce the Permanent Injunction). That settlement is contingent upon certain
16 actions occurring in a different proceeding. Although both parties expect the condition to be
17 satisfied, the parties cannot execute the settlement agreement until that happens. The other
18 proceeding should be concluded by the end of May.

19 In order to avoid unnecessary litigation, the parties jointly request a stay of the
20 deadline for Defendants’ response to Plaintiff’s partial motion for Attorney’s fees until June
21 5, a stay of oral argument on Plaintiff’s Emergency Motion to Enforce until sometime in
22 June, and the Joint Pretrial Statement be continued until June 30.¹ If an additional stay is
23 warranted at the end of May, the parties will so advise the Court.

24
25 ¹ Once the condition is satisfied, the parties will need some time to put together the text of
26 the agreement, and Defendants may need some time to obtain government approval of the
27 settlement.
28

1 Dated: March 1, 2023
2 By: /s/ *Justin Sadowsky*
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4 Gadeir I. Abbas
5 Justin Sadowsky
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12 *Attorneys for Plaintiff Said Elmajzoub*

Dated: March 1, 2023
By: /s/ *Frank A. Toddre, II*
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Tara Carpenter, Scott Davis, Marc La
Fleur, and Kim Thomas

Based on the foregoing Stipulation of the parties, **IT IS ORDERED** as follows:

- (1) Oral Arguments regarding the Emergency Motion to Enforce shall be VACATED and CONTINUED until June or a date convenient and available to the Court
- (2) That any Court ruling on Defendants' Motion to Strike be continued until after oral arguments considered in the above paragraph.
- (3) The Defendants' response to Plaintiff's Motion for Attorneys' Fees be continued to June 5, 2023.
- (4) The Joint Pretrial Statement be continued to June 30, 2023.

IT IS SO ORDERED:



Chief Judge

DATED this 1st day of March, 2023